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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

BRYAN WESLEY ANDERSON,

Defendant.

2:24-cr-0052-GMN-DJA

**Stipulation and Order to Continue
Hearing and Future Dates**

(Fifth Request)

The parties, by and through the undersigned, respectfully request that the Court vacate the hearing regarding change of plea that is currently set for April 22, 2025, at 9:00 a.m., and reset that hearing to a date and time convenient to this Court but no sooner than 90 days. In support of this request, the parties state the following:

1. Defendant Anderson is also charged in case 2:23-cr-0212-GMN-NJK. Pursuant to Rule 20 of the Federal Rules of Criminal Procedure, the instant case, 2:24-cr-0052-GMN-DJA was transferred to the District of Nevada in contemplation of resolution alongside case 2:23-cr-0212.

1 2. On August 10, 2024, Defendant Anderson filed a motion to suppress in case
2 2:23-cr-0212.

3 3. On September 19, 2024, Defendant Anderson filed a Notice of Attorney
4 Appearance in case 2:23-cr-0212, indicating that he had hired new counsel in that case. The
5 Court filed an order granting that notice the following day.

6 4. In subsequent discussions, the parties discussed whether the instant case,
7 2:24-cr-0052 would be returned to the originating district. Because of the recent substitution
8 of counsel in 2:23-cr-0212, no actions were taken until counsel could review the discovery
9 and discuss the options with Defendant Anderson.

10 5. Since that time, counsel in 2:23-cr-0212 and the government have engaged in
11 multiple rounds of discussions to resolve the cases, and the parties have made substantial
12 progress toward resolving the case. That resolution would also entail a resolution of the
13 instant case, 2:24-cr-0052.

14 6. If the cases are not resolved, then the instant case, 2:24-cr-0052 will be
15 returned to the originating district.

16 7. Given the circumstances, the parties request a continuance of the instant
17 matter, rather than an immediate return of the instant case to the originating district, to
18 enable the continued efforts to resolve both of Defendant Anderson's outstanding cases.

19 8. Denial of this request could result in a miscarriage of justice. This
20 continuance will allow Defendant time to continue investigation, review of discovery,
21 evaluation of potential legal positions in both outstanding cases, and discussion of
22 resolutions of both of Defendant's cases. The additional time requested by this stipulation is
23 excludable in computing the time within which the trial herein must commence pursuant to
24

1 the Speedy Trial Act, 18 U.S.C. §§ 3161 (h)(7) and (h)(7)(A), when considering the factors
2 under 18 U.S.C. §§ 3161(h)(7)(B)(i) and (vi).

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4 Respectfully submitted this 14th day of April, 2025.

5
6 SIGAL CHATTAH
United States Attorney

7 /s/ Steven J. Rose
8 STEVEN J. ROSE
Assistant United States Attorney

/s/ Jess Marchese
JESS MARCHESE
Counsel for Defendant,
BRYAN WAYNE ANDERSON

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

BRYAN WAYNE ANDERSON,

Defendant.

2:24-cr-0052-GMN-DJA

**Order Approving Stipulation to
Continue Hearing and Future Dates
(Fifth Request)**

Based on the pending stipulation of the parties, and upon the Court's finding of good cause, IT IS HEREBY ORDERED:

FINDINGS OF FACT

1. The parties agree to the continuance.
2. The additional time is needed to determine whether the instant case will remain in the District of Nevada.
3. The additional time requested herein is not sought for purposes of delay, but to facilitate defendant's arraignment on a related case, review of discovery, and ongoing discussions between counsel.

1 4. Additionally, denial of this request for a continuance could result in a miscarriage
2 of justice. The requested by this Stipulation is excludable in computing the time
3 within which the trial herein must commence pursuant to the Speedy Trial Act, 18
4 U.S.C. §§ 3161 (h)(7), and 3161(h)(7)(A), considering the factors under 18 U.S.C.
5 §§ 3161(h)(7)(B)(i) and (vi).

6 **CONCLUSIONS OF LAW**

7 The ends of justice served by granting said continuance outweigh the best interests of
8 the public and the defendant, since the failure to grant said continuance would be likely to
9 result in a miscarriage of justice, would deny the parties herein sufficient opportunity to
10 potentially resolve the cases prior to trial, and further would deny the parties sufficient time
11 and the opportunity within which to be able to effectively and thoroughly prepare for the trial,
12 taking into account the exercise of due diligence.

13 The time from the continuance sought herein is excludable under the Speedy Trial
14 Act, 18 U.S.C. §§ 3161(h)(7), and 3161(h)(7)(A), when considering the factors under 18
15 U.S.C. §§ 3161(h)(7)(B)(i) and (iv).

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ORDER

IT IS HEREBY ORDERED that the entry of plea currently scheduled for April 22, 2025, be vacated and continued to the 20th day of August, 2025, at the hour of 10:00 a.m

DATED this 15 day of April, 2025.



HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE